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November 8, 2017

VIA E-MAIL

Christopher M. Placitella
Cohen, Placitella & Roth, P.C.
127 Maple Avenue
Red Bank, NJ 07701

Brendan E. Little
Levy Konigsberg LLP
800 Third Avenue, 11th Fl.
New York, NY 10022

Re: *Kimberlee Williams, et al. v. BASF Catalysts LLC, et al.*

Dear Messrs. Placitella and Little:

We write to address apparent deficiencies in your November 2 and November 3 document productions. As you are aware, the Special Discovery Master ordered you to produce or log, among other materials, the complete client files for all six named plaintiffs and the complete client files for all putative class members represented by the Early Law Firm. *See* ECF No. 360 at 2-3; ECF No. 361 at 2-3. The deadline for production of these materials was November 2, 2017. However, it appears that your document production is incomplete.

First, with respect to Roseanne Chernick, it appears plaintiffs' document production was limited to some 260 documents. Over the past year, however, you have repeatedly told us that the Early Firm's file for the Chernick case is voluminous due to the length of time that case has been pending. Indeed, as of this past August, you still were treating the Chernick file as a special case, in contrast to the files for the five other plaintiffs. *See* 8/18/17 C. Placitella Ltr. to E. Assaf at 2. We therefore expected to receive more than 260 documents. Please confirm you have produced the entire file and are not withholding any remaining materials from the file. To the extent you are, in fact, withholding materials from Ms. Chernick's file, please state the basis for doing so.

Second, the Early Firm was ordered to produce or log all of its client files for all putative class members by November 2, 2017. *See* ECF No. 361 at 2-3. To date, we have received what appears to be only a portion of Roseanne Chernick's file. We understand that Early has at least

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three more relevant client files in its possession, *see* 10/26/17 Hr'g Tr. at 153:12 - 154:6, and your failure to produce them is a violation of the Special Discovery Master's Order. Please confirm that you will produce the remaining client files no later than November 9, 2017.

Finally, with respect to all six named plaintiffs, your November 2 and November 3 document productions include fewer than ten e-mails in total. Please confirm that you have produced all e-mails related to the named plaintiffs' cases, including internal e-mail correspondence within the Bevan Firm and the Early Firm, and are not withholding any such materials. To the extent you are, in fact, withholding e-mails related to the named plaintiffs' cases, please state the basis for doing so.

We look forward to your response.

Sincerely,

/s/ Eugene F. Assaf, P.C.

Eugene F. Assaf, P.C.

cc: Counsel for all parties